

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED
AUG 24 2022
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

V.

GABRIEL J. VAMBOI,

Defendant.

No.

4:22-CR-00471-HEA/JMB

INDICTMENT

The Grand Jury charges that:

COUNT I

On July 12, 2022, in St. Louis County, State of Missouri, within the Eastern District of Missouri, the defendant **GABRIEL J. VAMBOI** did knowingly and intentionally possess with intent to distribute to another person a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT II

The Grand Jury further charges that:

On July 12, 2022, in St. Louis County, State of Missouri in the Eastern District of Missouri, **GABRIEL J. VAMBOI**, the defendant herein, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, a FN FNS-9 9mm semiautomatic pistol, which traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) as set forth in Count I of this indictment, the defendants, **GABRIEL J. VAMBOI**, shall forfeit to the United States of America any property, constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such violation/s and any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such violations.

2. Subject to forfeiture upon a conviction of Count I is a sum of money equal to the total property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such violations.

3. The specific property subject to forfeiture includes, but is not limited to, the following:

a. One thousand, nine-hundred and seventy dollars (\$1,970.00) in United States Currency located and seized by law enforcement from **GABRIEL J. VAMBOI** on July 12, 2022.

b. A FN FNS-9 9mm semi-automatic pistol, seral number GKU0114997, located and seized by law enforcement from **GABRIEL J. VAMBOI** on July 12, 2022.

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL.

FOREPERSON

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